

Matter 7: Locating Development in the Right Place

Issue 1: Directing Development to the Right Place

Question 1

- 1.1.1. No. Policy AP01 does not define “the existing built-up area”, and the Policies Maps show no settlement boundaries. Without definitive boundaries, development outside existing built-up areas would continually extend them, making the policy ineffective. The Policies Maps should therefore define settlement limits to which Policy AP01 applies.

Question 2

- 1.1.2. As with Policy AP01, the absence of definitive settlement boundaries on the Policies Maps makes it unclear which areas constitute “countryside”. If countryside means any land without built development, its extent would change as development proceeds. The Main Modification requested in response to Question 1 is therefore also necessary for Policies AP03 and AP04 to be effective.

Question 3

- 1.1.3. Not entirely. Retaining natural boundaries “as far as possible” is imprecise and doesn’t provide clarity on when departure is acceptable: [AP01\(2\)\(c\), p.113](#). Main Modifications should provide further clarity by providing examples of where altering existing natural boundaries would be considered acceptable.

Question 5 — Exclusions from adjoining land

- 1.1.4. Yes. Both designations perform specific functions of maintaining gaps between settlements, and there is supporting evidence (Area of Separation Study (LAN-NLP3)) to demonstrate that there is a need to maintain gaps between the settlements listed in Policy DS04 to protect their character. It is therefore justified for stronger control over development within these designations, particularly on the edge of settlements where there would be the greatest pressure for development and therefore greatest risk of those designations being eroded.

Issue 2: Key Development Sites

- 1.1.5. Responses to the Issue 2 Questions relate to Proposed Allocations SA02 and proposed allocation GG1 by reason of the site being in close proximity to SA02.

General Question 1

- 1.1.6. No. Proposed allocation SA02 is not considered to be based on an up-to-date evidence base, effective, or consistent with national policy. Detailed reasoning is provided in STNT's Regulation 19 Representations; however, to summarise:

- The substantive reason for the proposed allocation of the site is the spatial strategy in the Leicestershire Strategic Growth Plan (SGP). As referred to in STNT's Matter 1 and Matter 3 Hearing Statements, the SGP is out-of-date principally because the infrastructure required to deliver that spatial strategy (an orbital highway around the south of Leicester (A46 Expressway) is no longer proposed. STNT also considers that the viability evidence-base relating to the allocation is not robust. STNT has also raised concerns over other evidence base documents that form the basis of the proposed strategic allocation and spatial strategy. These are referred to in its Matter 3 Hearing Statement. As such, the site is not considered to be based on up-to-date or credible evidence.
- The allocation is not considered to be deliverable. The site is identified as "marginally viable" in the Local Plan Viability Main Report (Examination Library Ref: INF-NLP3). There is the potential that even minor changes in the market or costs could result in the allocation not being deliverable. This marginal viability, combined with the strategic infrastructure that is required to deliver the allocation, which is not included in the viability appraisal, also questions whether all of the DS03 policy requirements, such as 40% affordable homes, can be delivered alongside the mitigation measures required to make the development acceptable. As a result, the allocation is not considered to be effective.
- By way of the proposed allocation and Policy DS03 not being effective, in that it would not deliver all of the infrastructure necessary to make the development of the site

sustainable or acceptable (such as affordable homes, education provision, etc.), it is not considered to be consistent with national policy. The allocations could also conflict with policies relating to designated heritage assets and designated biodiversity sites.

- 1.1.7. Further detail is provided in the responses below, STNT's Regulation 19 Representations and its Hearing Statements on other Matters.

General Question 3(iv) Benefits

- 1.1.8. Benefits of the allocation are purported to be housing, affordable homes, employment, schools and accessible green. However, as raised in its Regulation 19 Representations, STNT has serious concerns that the viability of the allocation may inhibit the ability to deliver certain benefits, such as 40% affordable housing, alongside the mitigation measures required to make the development of the site acceptable.

General Question 3(v) Neighbouring uses and adverse impacts

- 1.1.9. The proposals affect Areas of Separation proposed to be designated in the local plan, numerous designated heritage assets and their settings, LWS, agricultural land (chapter 11 paragraphs 11.7.1–11.7.6, p.18 of the Environmental Statement submitted with the current planning application for the site (HDC ref: 26/01350/OUT) identifies the permanent loss of 138 hectares of best and most versatile agricultural land, and categorises this as a major adverse significant effect).

General Question 3(viii) Wider transport

- 1.1.10. As set out in STNT's Regulation 19 Representations (Section 4.2), the allocation of the site and Policy SA02 do not account for the significant off-site strategic highway interventions / improvements that are required. There is clear evidence (as referred to in STNT's Matter 3 Hearing Statement) that the surrounding road network is operating significantly above capacity and that major road enhancements are required, including an orbital route around the south of Leicester, to accommodate the cumulative impacts of this allocation and other allocations and development proposed in the Local Plans of other Leicestershire Authorities,

alongside significant investment in public transport and active travel routes. There is no secured, fully funded or detailed plan to deliver this infrastructure. The LTA has objected to the Local Plan on this basis, as confirmed in the Highways SOCG (Examination Library Ref: HDC9).

- 1.1.11. Furthermore, the Pan-Regional Transport Model, which has been used to test the highway implications of the allocations, does not model large sites that are not proposed for allocation (such as those submitted through call for sites exercises) in its cross boundary assessment. The impact of this is that the assessment is fragmented and does not account for the cross-boundary impact of developments close to local authority boundaries and therefore underestimates traffic impacts.
- 1.1.12. STNT therefore considers that the wider transport implications of the allocation have not been fully considered.

General Question 3(ix) Infrastructure and constraints

- 1.1.13. Policy SA02 identifies necessary education, transport, drainage, sewerage and community infrastructure. However, it does not require delivery of the substantial off-site strategic highway works needed to make the development acceptable. STNT is concerned that the site's viability cannot support all necessary infrastructure. [LCC officers' report, paragraphs 43–47, pp.10–11](#), identifies unresolved delivery and viability mechanisms for education and highway improvements where viability is marginal. The allocation has therefore not been shown capable of delivering all infrastructure required to make it acceptable.
- 1.1.14. There are also considered to be other physical constraints to the development on the site, aside from the significant highway capacity issues. In particular, the Drainage Strategy submitted with the outline planning application for the site identifies that there are sewer capacity limits.

General Question 3(x) Availability and delivery

- 1.1.15. STNT considers that the site is not realistically viable and developable. As referred to in other responses in this Statement, in order to be acceptable, the allocation needs to provide significant amounts of infrastructure, and the evidence base does not provide the clarity that there is sufficient funding or delivery mechanisms to provide that infrastructure.
- 1.1.16. STNT identifies significant gaps, omissions and inconsistencies in the allocation's viability evidence. The January 2025 Viability Assessment (INF-NLP3) describes the allocation as marginally viable, yet the site promoter claims on page 92 a 25% internal rate of return and has provided no development appraisal. This calls the appraisal assumptions into question. Infrastructure and Section 106 cost assumptions also appear to have been redacted, although their funding and delivery are central to viability and should be available to the Examination.
- 1.1.17. The PPG (ref: 10-011-20180724) emphasis that viability assessments should be transparent and publicly available. It is not considered that this is currently the case.

General Question 3(xi) Boundary

- 1.1.18. No. As set out in STNT's response to Matter 5, it is considered that the boundary of the site would conflict with the purposes of the proposed Area of Separation designation between Oadby and Great Glen, making that designation ineffective. Additionally, whilst the site boundary excludes the scheduled monument following the Main Modification in [Policies Map modification PM4, PDF p.63](#), this does not resolve the potential for development at the site to harm its setting.

General Question 3(xii) Main modifications

- 1.1.19. For the reasons set out above, STNT considers that SA02/OA1 to not be justified, based on an up-to-date evidence base, effective and consistent with national policy. This does not just relate to the allocation itself, but also the inappropriateness of the Plan's spatial strategy focusing significant development to the south east of Leicester. The cumulative impact of developments in this location, including the impact of development at the SA02 allocation,

would have significant harmful impacts and does not represent the most appropriate strategy for delivering Harborough's housing need. It therefore considers that the allocation should be deleted from the Plan and the spatial strategy should be reconsidered.

Issue 2: Additional Site-Specific Questions — SA02/OA1 and GG1

Question 1 — 3,150 homes beyond the Plan period

- 1.1.20. Extending beyond the Plan period is not inherently unsound: [NPPF paragraph 74 and footnote 39](#) allow it. STNT's objection is the allocation of the full quantum without showing a credible, policy-compliant route through its infrastructure and environmental constraints. Counting only 1,200 homes before 2041 does not justify deferring constraints that determine the suitability of the whole allocation to after the plan-period.

Question 3 — Cross-boundary masterplan

- 1.1.21. Yes. Without a cross-boundary masterplan, there would be no agreed coordination of matters such as phasing, BNG provision, and infrastructure timing. It should be noted that [HDC4c, paragraph 2.2, PDF p.8](#), identifies 3,150 Harborough and 850 OWBC homes, whereas ID9's notes 890 to be delivered in Oadby and Wigton. We assume this is a drafting error in ID9.

Question 4 — Scheduled monument within allocation

- 1.1.22. Its inclusion is unnecessary where no development is intended; however, exclusion from the site boundary must not be treated as eliminating any requirement to demonstrate no impact on the historic setting.

Question 5 — Heritage assessment and buffer

- 1.1.23. No. NPPF paragraph 196 requires Local Plans to consider the desirability of sustaining and enhancing heritage assets. The absence of an assessment of the site's effects on designated assets is therefore a significant omission. Although the policy requires a Heritage Assessment and buffer at application stage, it has not been shown that an adequate buffer is achievable.

Deferring assessment risks allocating a site that is not deliverable where a buffer is not achievable.

Question 6 — SA02/Appendix 6 interaction

- 1.1.24. SA02 should establish binding site-specific policy requirements so that the policy is clear on the development requirements for the site, whereas Appendix 6 should provide guidance on the content, structure and procedure for the creation of a masterplan only.

Question 8 — Employment and city-centre offices

- 1.1.25. Part 4(d) needs to be clearer on the acceptable Use Classes of employment development that should be provided on the site in order to provide clarity. It is considered that this needs to be specified at the Plan stage and not deferred to a planning application, as the type of employment development on the site could impact on the infrastructure required to make the allocation acceptable, particularly highway infrastructure. The type of employment that is acceptable on the site may also impact on the viability of the allocation, so does need to be considered at the plan stage.

Question 9 — Strategic orbital connection

- 1.1.26. Yes. Evidence from the LTA shows that there remains a need for an orbital connection to the south of Leicester to mitigate the cumulative impacts of development proposed in numerous Leicestershire local authority local plans. Whilst Policy SA02 requires land to be reserved for an orbital route within the site, there is no requirement for land outside of the site to be reserved in the Plan. The Plan therefore needs to set out how such a route can be delivered and funded by SA02 and other allocations and ensure that land outside of the SA02 boundary is safeguarded.

Question 10 — Fifteen-minute zero-carbon bus service

- 1.1.27. Without detail on how a 15-minute bus service would operate, including details such as routing and the impact on existing bus provision in the surrounding area, it is not considered that the policy is effective.

Question 11 — Education

- 1.1.28. The pupil-place basis delivery remains unresolved. [MM13.2, pp.25–26](#), changes provision to six primary forms of entry and distinguishes five secondary forms generated by the site from wider demand. [LCC paragraphs 43–47, pp.10–11](#), identifies outstanding equalisation and delivery arrangements. Given that the provision of education facilities is necessary to make the development of the site acceptable, it needs to be demonstrated at the Local Plan stage that such infrastructure can be delivered. Given the current uncertainty over how education provision can be delivered, it is not considered that deferring evidence on deliverability to an Education Delivery Strategy at the planning application stage is an effective policy that ensures the allocation is deliverable. Instead, consideration needs to be given to the deliverability of the education provision at the Local Plan stage, and the policy should contain a clear requirement on how it will be delivered.

Question 12 — Area of Separation

- 1.1.29. See STNT's Matter 5 Hearing Statement in which STNT sets out that it considers that the proposed allocation and the Area of Separation designation would be incompatible and would result in clear policy conflicts. As a result, in-combination, Policies SA02 and DS04 are not effective. Notwithstanding this, the local plan needs to be clear on what the Area of Separation between Oadby and Great Glen / Stretton Hall is and should require no development to take place within that designation. It should not defer this to the application stage as a clear understanding of what the Area of Separation needs to be in order to fulfil the objectives of Policy DS04 is central to ensuring the SA02 allocation is deliverable.

Question 13 — Updated viability

- 1.1.30. No reconciled policy-compliant update has been established. [INF-NLP3, Table 7.2, p.86](#), shows SA02's residual land value £13.395 million below its benchmark at 40% affordable housing. [HDC12, PDF pp.4–5](#), reports district-wide cost reductions, while the SA02 applicant now proposes viability flexibility. Test current whole-site costs, land assumptions and phase cashflow together. STNT maintains deletion because those unresolved matters affect the package's feasibility and expected contributions to infrastructures to support it, not merely its wording. [Reg19 §4.1, p.17](#).

Issue 2: Additional Site-Specific Questions — Connected Allocations

TB1 Questions 2 and 6; S1 Questions 4 and 8; S2 Question 2 — Cumulative transport and DS05

- 1.1.31. A coordinated obligation must identify each site's contribution and the timing of shared mitigation, rather than repeat DS05. [HDC14, paragraphs 5.71–5.74](#), provides strategic modelling; it does not replace the site-cluster delivery mechanism sought by these questions. Reconcile cumulative assumptions, funded works and occupation triggers across S1, S2 and TB1 before relying on independent site assessments. [Reg19 §4.2, p.20](#).

S1 Questions 3 and 7 — Viability and commencement

- 1.1.32. The [S1 template, p.4](#), reports land control and an application but retains marginal viability while forecasting 250 completions in the first five years. That requires clear delivery evidence, including permissions, infrastructure lead times and a current appraisal; promoter confidence alone does not establish the proposed 2030/31 start. [Reg19 §4.1, p.17](#).

G1 Question 1 — Coordinated infrastructure

- 1.1.33. [MM12.14, pp.21–22](#), strengthens coordination with OA1. Its effectiveness depends on identifying which infrastructure is shared, who delivers it and when. Separate development programmes cannot each assume that the other allocation will provide the enabling service first. [Reg19 §4.2, p.20](#).

GG1 Question 2 — A6 and active travel

- 1.1.34. The policy requires assessment and coordination, not proof that the impacts are already resolved. [GG1 criteria 3–4, pp.61–62](#), distinguish transport assessment from school parking improvements. Test London Road/Leicester Grammar School peak time traffic with cumulative A6 impacts and continuous walking/cycling connections with SA02; isolated parking or junction works do not answer the network question. [Reg19 §4.2, p.20](#).

GG1 Question 3 — Wastewater

- 1.1.35. [HDC16, PDF pp.5–7](#), gives strategic provider assurance subject to capacity planning; it is not a GG1-specific connection programme. Match GG1's forecast early delivery to confirmed sewer and treatment capacity and any necessary reinforcement before occupation. [Reg19 §4.2, p.20](#).

GG1 Question 4 — Masterplan

- 1.1.36. The requirement is express, but its procedure and relationship with SA02 need clarification: [GG1 criterion 1, p.61](#). Apply Appendix 6 and require compatible interfaces, shared-service phasing and approval arrangements. Two separate masterplans should not leave the connecting infrastructure or separation corridor unresolved. [Reg19 §4.2, p.20](#).

GG1 Question 5 — Separation

- 1.1.37. Not established. [LUC paragraph 4.30, p.27](#), warns that development of GG1's valley land could significantly weaken separation if strategic growth proceeds westwards. Test the combined built envelope and protected valley corridor; neither site's open-space percentage answers the cumulative coalescence concern. [Reg19 §8.1.2, p.31](#).

GG1 Question 7 — Flooding

- 1.1.38. [GG1 criterion 8, pp.62–63](#), requires flood assessment, sustainable drainage and maintenance. Demonstrate the downstream outcome with cumulative catchment modelling and secured management. A requirement for SuDS does not itself establish betterment which is essential

given Great Glen's 2025 major flood at the bottom of the slope on which GG1 would reside. [Reg19 §8.1.4, p.34.](#)

GG1 Question 8 — Heritage

- 1.1.39. [GG1 criterion 2, p.61](#), identifies nearby heritage sensitivities and requires assessment. Judge GG1's effects alongside SA02's changes to shared settings. SA02's HIA cannot simply be treated as clearance for a different allocation; the combined effect and necessary mitigation require their own evidential conclusion. [Reg19 §5, p.24.](#)

GG1 Question 9 — Sports/community hub

- 1.1.40. [GG1 criterion 6, p.62](#), does not by itself settle the delivery partnership. Specify the facilities, public access, funding, timing and integration with existing provision. Otherwise nominal provision risks being counted as an accessible community benefit before its practical availability is established. [Reg19 §8.1.7, p.36.](#)

K1 Question 1 — A6 cumulative effects

- 1.1.41. Yes. Additional traffic requires cumulative assessment, not an assumption of either acceptability or severe harm. [HDC14, paragraphs 5.71–5.99, pp.18–23](#), supplies the strategic context. Demonstrate how K1, existing commitments and other A6 growth interact, including safety and air quality; an SA02-only analysis cannot answer that corridor-wide question. [Reg19 §4.2, p.20.](#)

MP1/MP2 Question 6 — A5 cumulative effects

- 1.1.42. The disagreement remains material: [LCC officers' report, paragraphs 36–39, p.9](#), records differing highway-authority positions. Resolve the residual cumulative effects and necessary funded mitigation. STNT relies on this only for its original strategic-infrastructure concern, not as a new objection to Magna Park's allocation principle. [Reg19 §4.2, p.20.](#)